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17 *Attorneys for All Defendants*

18 **UNITED STATES DISTRICT COURT**
19 **CENTRAL DISTRICT OF CALIFORNIA**

20 KEVIN RISTO, on behalf of himself
21 and all others similarly situated,

22 Plaintiff,

23 vs.

24 SCREEN ACTORS GUILD-
25 AMERICAN FEDERATION OF
26 TELEVISION AND RADIO
27 ARTISTS, a Delaware corporation;
28 AMERICAN FEDERATION OF
MUSICIANS OF THE UNITED
STATES AND CANADA, a California
nonprofit corporation; RAYMOND M.
HAIR, JR., an individual, as Trustee of
the AFM and SAG-AFTRA Intellectual
Property Rights Distribution Fund;
TINO GAGLIARDI, an individual, as
Trustee of the AFM and SAG-AFTRA

Case No. 2:18-cv-07241-CAS-PLA
Class Action

**NOTICE OF JOINT STIPULATION
RE: MOTION TO COMPEL
DISCOVERY UNDER L.R. 37-2**

Date: January 15, 2019
Time: 10:00 a.m.
Dept.: 780
Judge: Hon. Paul L. Abrams

Discovery Cut-Off: Not Scheduled
Pre-Trial Conference: Not Scheduled
Trial Date: Not Scheduled

1 Intellectual Property Rights
2 Distribution Fund; DUNCAN
3 CRABTREE-IRELAND, an individual,
4 as Trustee of the AFM and SAG-
5 AFTRA Intellectual Property Rights
6 Distribution Fund; STEFANIE TAUB,
7 an individual, as Trustee of the AFM
8 and SAG-AFTRA Intellectual Property
9 Rights Distribution Fund; JON JOYCE,
10 an individual, as Trustee of the AFM
11 and SAG-AFTRA Intellectual Property
12 Rights Distribution Fund; BRUCE
BOUTON, an individual, as Trustee
of the AFM and SAG-AFTRA
Intellectual Property Rights
Distribution Fund; and DOE
RESPONDING PARTY 1-10,

Responding Party.

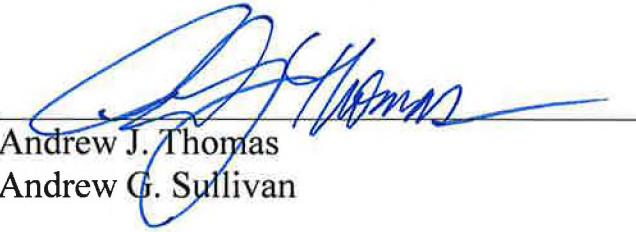
1 TO THE CLERK OF THE COURT, ALL PARTIES, AND THEIR ATTORNEYS
2 OF RECORD:

3 PLEASE TAKE NOTICE that on January 15, 2019 at 10:00 a.m., or as soon
4 thereafter as counsel may be heard, in Courtroom 780 of the Roybal Federal
5 Building and United States Courthouse, located at 255 E. Temple Street, Los
6 Angeles, California 90012, 5th Floor, before the Honorable Paul L. Abrams,
7 Defendants Screen Actors Guild-American Federation of Television and Radio
8 Artists (“SAG-AFTRA”), American Federation of Musicians of the United States
9 and Canada (“AFM”), Raymond M. Hair, Jr., Tino Gagliardi, Duncan Crabtree-
10 Ireland, Stefanie Taub, Jon Joyce, and Bruce Bouton (collectively, “Defendants”)
11 will, and hereby do, move the Court for an order compelling Plaintiff Kevin Risto
12 to produce documents responsive to Plaintiff’s Requests for Production Nos. 7-10.

13 This Motion is made pursuant to Federal Rule of Civil Procedure 37 and
14 Local Rule 37-2. This Motion is based on this Notice of Motion and Motion, the
15 concurrently filed Joint Stipulation and Declaration of Andrew J. Thomas with
16 Exhibits A-D, the record in this matter, and any further evidence or argument that
17 may be received by the Court at or before the hearing on this Motion.

18 This Motion is made following the conference of counsel pursuant to L.R.
19 37-1 which took place on November 13, 2019.

20 DATED: December 23, 2019 JENNER & BLOCK LLP

21 By: 
22 Andrew J. Thomas
23 Andrew G. Sullivan

24
25 JENNER & BLOCK LLP
26 Devi M. Rao (*pro hac vice*)
27
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Attorneys for All Defendants